

ALEX G. TSE (CABN 152348)
Acting United States Attorney
SARA WINSLOW (DCBN 457643)
Chief, Civil Division
WENDY M. GARBERS (CABN 213208)
Assistant United States Attorney
DAVID A. PEREDA (CABN 237982)
Assistant United States Attorney
450 Golden Gate Avenue, Box 36055
San Francisco, California 94102-3495
Telephone: (415) 436-6475
FAX: (415) 436-7234
wendy.garbers@usdoj.gov

Attorneys for Defendant SECRETARY OF
THE DEPARTMENT OF HOMELAND
SECURITY

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

K. H., C.V., W.L., J.M., JEFFREY BOYER,
BRIAN PIEROG, DONNA BAXTER,
RICHARD DEVIVO, and GARY
MCCONAGHY, on behalf of themselves and
those similarly situated,

Plaintiffs,

v.

THE SECRETARY OF THE DEPARTMENT
OF HOMELAND SECURITY,

Defendant.

Case No. 15-cv-02740 JST

**STIPULATION AND ~~PROPOSED~~ ORDER RE
SETTLEMENT AND VACATING DEADLINES**

The Honorable Jon S. Tigar

STIPULATION

WHEREAS, on February 23, 2018, the parties participated in an all-day settlement conference led
by Magistrate Judge Laurel Beeler;

WHEREAS, the parties reached a global settlement of the action subject to necessary governmental
approvals;

WHEREAS, the settlement was put on the record;

1 WHEREAS, the parties also contemplate preparing a written settlement agreement, which will be
2 signed by all opt-in plaintiffs; and

3 WHEREAS, the parties estimate that it will take about 60 days to document the settlement and
4 obtain the requisite governmental approvals;

5 IT IS HEREBY STIPULATED, by the parties to the above-captioned action, by and through their
6 respective counsel of record, that:

- 7 1. All deadlines and other dates currently on calendar are vacated; and
8 2. Within 60 days, the parties will file a joint statement reporting on the status of finalizing the
9 settlement.

10 DATED: February 28, 2018

Respectfully submitted,

11 ALEX G. TSE
12 Acting United States Attorney

13 /s/ Wendy M. Garbers
14 WENDY M. GARBERS
15 Assistant United States Attorney
Attorneys for Defendant

16 DATED: February 28, 2018

CLARK HILL PLLC

17 /s/ Nicholas M. Wieczorek *
18 NICHOLAS M. WIECZOREK
Attorneys for Plaintiffs

19 **In compliance with Civil Local Rule 5-1(i)(3), the filer of this document attests under penalty of perjury*
20 *that all signatories have concurred in the filing of this document.*

21 **~~[PROPOSED]~~ ORDER**

22
23 Pursuant to the parties' settlement and stipulation, IT IS SO ORDERED.

24
25 Dated: March 1, 2018

26
27 
28 THE HONORABLE JON S. TIGAR